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December 22, 2024

Hon. Nelson S. Roman  
United States District Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601-4150

USDC SDNY  
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Re: *United States v Juan Jose Genao-Adames*, 23 Cr. 261-08 (NSR)

Your Honor:

On November 8, 2024, I was appointed to represent Juan Jose Genao-Adames in the referenced case, replacing Theodore Green. I write now to ask for additional time to file motions on behalf of Mr. Genao-Adames.

At the time I was appointed, I was in the midst of preparing for a trial, which concluded on December 13, 2024. The government advised me at the time of the motion schedule that predated by client's arrest, but in view of my recent appointment, suggested that I propose that my client's deadline be extended to March 28, 2025, when the next status conference is scheduled to occur. I meant to submit a letter asking for such an extension, but to be candid, neglected to do so because of my imminent trial. I apologize for that oversight. In any event, I note that I am still waiting to receive the discovery so cannot realistically file any potential motions currently.

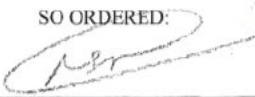
Accordingly, I ask that this Court extend the deadline for Mr. Genao-Adames to file pre-trial motions to March, 28 2025. As already noted, the government consents to this application.

**The Court GRANTS defendant Genao-Adames' (08) consented-to extension to file pre-trial motions to March 28, 2025. The Govt's response will be due April 28, 2025 and Deft's Adames' reply will be due May 13, 2025. The Clerk of Court is kindly requested to terminate the motion at ECF No. 132.**

Respectfully submitted,

/s/  
James E. Neuman

**Dated: Feb. 3, 2025  
White Plains, NY**

SO ORDERED:  
  
NELSON S. ROMÁN  
United States District Judge

MEMO ENDORSED